

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS**

PIERRE BRAZEAU, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CASSAVA SCIENCES, INC., REMI  
BARBIER, ERIC J. SCHOEN, JAMES W.  
KUPIEC, NADAV FRIEDMANN and  
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

WANDA NEWELL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CASSAVA SCIENCES, INC., REMI  
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CASSAVA SCIENCES, INC., REMI  
BARBIER, ERIC J. SCHOEN, JAMES W.  
KUPIEC, NADAV FRIEDMANN and  
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00856

**[PROPOSED] ORDER CONSOLIDATING RELATED ACTIONS, APPOINTING  
LEAD PLAINTIFF, AND APPROVING SELECTION OF LEAD COUNSEL**

Having considered the motion of Proposed Lead Plaintiff, Warren Choi, Kevin Otto, and Ken Van Ho, investors in Cassava securities including common stock and options, (collectively the “Cassava Securities Group” or “Movant”) for consolidation of related actions, appointment of Movant as Lead Plaintiff, and approval of selection of Berger Montague PC as Lead Counsel and Burns Charest LLP as Local Counsel (the “Motion”), IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Pursuant to Federal Rule of Civil Procedure 42(a), *Brazeau v. Cassava Sciences, Inc.*, No. 1:21-cv-00751-RP (W.D. Tex.); *Newell v. Cassava Sciences, Inc.*, No. 1:21-cv-00760-RP (W.D. Tex.); and *Rein v. Cassava Sciences, Inc.*, No. 1:21-cv-00856-RP (W.D. Tex.) are consolidated as:

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

In re CASSAVA SCIENCES, INC. SECURITIES LITIGATION	)	Master File No. 1:21-cv-00751-RP
	)	
	)	<u>CLASS ACTION</u>
	)	
This Document Relates To:	)	
ALL ACTIONS.	)	
	)	
	)	

(a) The file in Case No. 1:21-cv-00751-RP (W.D. Tex.) will constitute the master file for every action in the consolidated action. The Clerk will administratively close the other actions. When the document being filed pertains to all actions, the phrase “All Actions” will appear immediately after the phrase “This Document Relates To:”. When a pleading applies to some, but not all, of the actions, the document will list, immediately after the phrase “This

Document Relates To:”, the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action;

(b) All securities class actions on behalf of purchasers of Cassava Sciences, Inc. securities subsequently filed in, or transferred to, this District will be consolidated into this action. This Order will apply to every such action, absent an order of the Court. A party objecting to such consolidation or to any other provisions of this Order must file an application for relief from this Order within ten days after the action is consolidated into this action; and

(c) This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, with good cause shown;

3. The Cassava Securities Group, consisting of Warren Choi, Kevin Otto, and Ken Van Ho, are appointed as Lead Plaintiff for the class pursuant to 15 U.S.C. §78u-4(a)(3)(B)(iii).

4. Berger Montague PC is appointed as Lead Counsel for the class, and Burns Charest LLP is appointed as Local Counsel. Lead Counsel and Local Counsel will have the following responsibilities and duties on behalf of Lead Plaintiff and the putative class:

- (a) the briefing and argument of any and all motions;
- (b) the conduct of any and all discovery proceedings, including, without limitation, depositions;
- (c) the selection of counsel to act as spokesperson at all pretrial conferences;
- (d) the organization of meetings of plaintiffs’ counsel as they deem necessary and appropriate from time to time;
- (e) settlement negotiations with counsel for defendants;
- (f) the pretrial discovery proceedings, the preparation for trial, the trial of this matter, and delegation of work responsibilities to selected counsel as may be required;

(g) the preparation and filing of all pleadings; and

(h) the supervision of all other matters concerning the prosecution or resolution of the consolidated action.

**IT IS SO ORDERED.**

DATE: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE  
WESTERN DISTRICT OF TEXAS